

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Application Number : 09/883,501 Confirmation No.: 8690
Applicant : Bedell, Jeffrey A
Filed : June 19, 2001
Title : System And Method For Run-Time Report Resolution Of Reports
That Include Prompt Objects
TC/Art Unit : 2176
Examiner: : William L. Bashore

Docket No. : 53470.003041
Customer No. : **21967**

REPLY BRIEF

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In response to the Examiner's Answer of June 28, 2006 Appellant respectfully requests that the Board of Patent Appeals and Interferences reconsider and withdraw the rejections of record, and allow the pending claims.

I. Status of Claims

Claims 1-20 are pending in this application. All of these claims are currently rejected.

The rejection of claims 1-20 is appealed.

II. Grounds of Rejection to be Reviewed on Appeal

The issues on appeal are whether the following rejections are proper: (1) the rejection under 35 U.S.C. § 103(a) of claims 1-6, 8-12, and 14-20 as being unpatentable over U.S. Patent No. 5,963,939 to McCann et al. ("McCann"), and (2) the rejection under 35 U.S.C. § 103(a) of claims 7 and 13 based on McCann in view of U.S. Patent No. 6,569,205 to Poggi ("Poggi").

III. Argument

A. The rejection under 35 U.S.C. § 103(a) of claims 1-6, 8-12, and 14-20 as being unpatentable over U.S. Patent No. 5,963,939 to McCann et al. (“McCann”) is improper

On Page 4 of the Examiner’s Answer, Claims 1-6, 8-12, and 14-20 were rejected under 35 U.S.C. § 103(a) as being obvious.

The Examiner’s Answer continues to repeat an essential error in this case. The Examiner alleges that McCann “teaches receiving a report instance at a server system from a client (Fig. 45) that has initiated report execution of the report that includes one or more prompts (items 556 and 558 in Fig. 45)” See Examiners Answer Page 5.

McCann does not disclose or suggest “receiving a *report instance* from a client that has initiated report execution of the report that includes one or more prompt objects,” as recited in independent claims 1, 9, and 16. First, McCann does not disclose or suggest a “report.” In fact, the word “report” does not appear anywhere in the McCann specification.

Applicants’ specification defines a report instance as “an actual execution of a defined report.” See, Specification, page 2, lines 17-18. The Examiner’s Answer cites Figure 45 and items 556 and 558 of Figure 45 to teach this element. Figure 45 shows a web page having a sign-on box including a prompt and text field for ID (556) and password (558). This is not “an actual execution of a defined report.” Presumably, the web page is created by the server, so it is not clear what in Figure 45 has been received by and initiated by the client. Regardless, whatever is received by the server and initiate by the client in Figure 45 is not a report instance.

McCann also does not disclose or suggest “gather[ing]...the one or more prompt objects referenced in the report.” The Examiner continues to allege that a sign-on button 562 in the login screen of Figure 45 to teach this feature. The sign-on button causes the server to receive

the ID and password entered into the web page. The ID and password are merely answers to a prompt, and this action merely involves the transfer of data from one place to another. The ID and password themselves are not prompt objects. McCann as cited by the Examiner does not suggest that the login and password elements are more than static fields which reside in a fixed page definition and that they have to be gathered from anywhere. The ID and password do not each comprise a question to be asked of a user and at least one validation property. Thus, nothing about the sign-on button or the login screen of Figure 45 discloses or suggests gathering prompt objects. Furthermore, any prompts or objects involved in Figure 45 are not related to a report.

Appellant notes that the Examiner relies on McCann's disclosure of 'submit purchase order' (Fig. 57)" to disclose both executing the report (Page 6, Examiner's Answer) and displaying result information (Examiner's Answer, page 10). Appellant disagrees. It is not clear how a single figure of a purchase order can represent both the execution of a report and the results of a report. The Examiner further alleges "McCann teaches a final 'report instance' in the form of the defined report of Figure 57." Examiner's Answer, page 10. Thus the Examiner seems to allege that Figure 57 is again the final 'report instance' or completed report which conflicts with the allegation on page 6 of the Examiner's Answer that Figure 57 and "purpose of submitting purchase order" can teach the execution of a report. The Examiner further alleges that McCann 'initiates' report execution by beginning the report process via a series of questions along with prompt objects" Examiner's Answer, Page 10. Applicant respectfully disagrees. Appellant again respectfully notes that the word "report" does not appear in the McCann specification. The Examiner asserts that a report "can be fairly interpreted as a presentation of information resulting from an analysis." Examiner's Answer, Page 10. The Examiner alleges

that “submitting a purchase order ‘finalizes’ and makes official said order, which can be a form of ‘executing.’” Examiner’s Answer pages 12-13. Appellant respectfully submits that “making official” a purchase order as cited by the Examiner does not disclose “presentation of information resulting from an analysis.”

Moreover, Applicants are perplexed at how the “submit purchase order” of Figure 57 and the purpose for submitting the purchase can be found to suggest the specific step of “executing the report upon receiving answers from a user to the one or more questions in the resolution object.” In particular, Applicants respectfully submit that the mere submission of a purchase order fails to teach or suggest the step of executing the report upon receiving answers from a user to the one or more questions in the resolution object. Thus, the obviousness rejections in the Examiner’s Answer are nothing more than conclusory statements comprising the type of hindsight reconstruction that the courts and this Board have warned against for decades.

Claims 2-8, 10-15, and 17-20 depend from claims 1, 9, and 16, respectively, and thereby incorporate the features discussed above by reference. Thus, McCann does not disclose or suggest these claims for the same reasons.

For at least the reasons set forth above, the pending obviousness rejection of claims 1-6, 8-12 and 14-20 based on McCann is improper and should be overturned.

B. The rejection under 35 U.S.C. § 103(a) of claims 7 and 13 as unpatentable over McCann in view of U.S. Patent No. 6,569,205 to Poggi is improper.

The Examiner’s Answer continues to repeat an essential error in this case. The Examiner alleges that Poggi teaches the claim element “check[ing] for cached reports prior to report execution,” as recited in claims 7 and 13. Poggi discloses:

A method and system for report presentation and navigation in a computer system that includes multiple reports about multiple components. The method

and system include defining relationships between the multiple reports and the multiple components, and visually representing the relationships on a currently displayed report. The method and system further include visually indicating a position of the currently displayed report among the relationships, thereby reducing user disorientation while navigating through the multiple reports.

Poggi Abstract.

Appellant respectfully disagrees. The cited language of Poggi does not mention cached reports or checking for cached reports prior to execution. The cited Figure contains the label cache report but no explanation of the meaning. The Figure cited in the Examiner's Answer does not teach or disclose "check[ing] for cached reports prior to report execution."

McCann does not disclose or suggest claims 1 and 9 for the reasons discussed above. Poggi does not remedy the deficiencies of McCann. The combination of McCann and Poggi similarly fails to disclose or suggest claims 1 and 9. Claims 7 and 13 depend from claims 1 and 9, respectively. Thus, the combination of McCann and Poggi fails to disclose or suggest claims 7 and 13.

Furthermore, the combination of McCann and Poggi is improper. Applicants respectfully submit that the alleged motivation in the Examiner's Answer -- providing the capability for presentation and navigation in a computer system that includes multiple reports about multiple components -- is not suggested anywhere in McCann or Poggi and the Examiner's Answer fails to provide any other source to back up that blanket contention. Moreover, Applicants respectfully submit that there is no motivation to combine Poggi with the teachings of McCann because McCann does not disclose a "report" or, as the Examiner's Answer admits, "McCann does not explicitly teach 'executing.'" Examiner's Answer, p. 5.

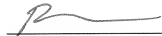
For at least these reasons, therefore, Applicants respectfully request that the instant rejection of claims 7 and 13 be withdrawn.

IV. Conclusion

In view of the foregoing, Appellant respectfully requests that the Board reverse the prior art rejections set forth in the Examiner's Answer, and allow all of the pending claims.

Respectfully submitted,

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